REMARKS

In the Office Action[1] ("OA") mailed June 13, 2005, the Examiner rejected claims

1, 3, and 16 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No.

6,532,241 to Ferguson et al. ("*Ferguson*") in view of U.S. Patent No. 6,163,544 to

Andersson et al. ("*Andersson*"); and rejected claims 4-8, 17, and 18 under 35 U.S.C.

§103(a) as unpatentable over *Ferguson* in view of *Andersson*, and further in view of

U.S. Patent No. 5,926,463 to Ahearn et al. ("*Ahearn*"). The Examiner also rejected

claims 1, 3-8, and 16-18 under 35 U.S.C. §103(a) as being unpatentable over U.S.

Patent No. 6,549,940 to Allen et al. ("*Allen*") in view of *Andersson*.

By this amendment, Applicants amend claims 1, 3, 16, and 17, and cancel claim

18. Claims 1, 3-8, 16, and 17 remain pending in this application. Support for the

amendment may be found in, for example, FIGS. 4-7 of the drawings and page 16, lines

12-14 of the specification. In view of above amendments and the following remarks,

Applicants respectfully traverse the Examiner's rejections of the claims under 35 U.S.C.

§103(a).

To establish a prima facie case of obviousness, three basic criteria must be met.

First, the prior art reference as modified must teach or suggest all the claim elements.

(See M.P.E.P. 2143.03 (8th ed. 2001)). Second, there must be some suggestion or

motivation, either in the reference or in the knowledge generally available to one of

ordinary skill in the art, to modify the reference or combine the reference teachings.

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

(See M.P.E.P. 2143 (8th ed. 2001)). Third a reasonable expectation of success must exist. Moreover, each of these requirement must "be found in the prior art, and not be based on applicant's disclosure." (M.P.E.P. 2143.03 (8th ed. 2001)).

Claim 1, as amended, recites a combination including, for example, "providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the selected customer record contains the actual circuit path information having heterogeneous network components associated with the selected customer record and the heterogeneous network components support a specific service for the customer, and wherein the actual circuit path information is used to generate a graphical representation of the heterogeneous network components spanning the customer and the specific service."

First, the Examiner rejected claims 1, 3, and 16 under 35 U.S.C. 103(a) as unpatentable over *Ferguson* in view of *Andersson*. With respect to claim 1, the Examiner alleged that *Ferguson* discloses: "receiving identification data corresponding to a customer in a network, wherein the customer is an entity of a type selected from the group consisting of a natural person, a company, an organization, and an enterprise; accessing a database for one or more customer records corresponding to the customer identification data; receiving selection information identifying a selected one of the one or more customer records, wherein the selected customer record corresponds to the customer; and providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the actual circuit path information is used to generate a graphical representation of heterogeneous network

-9-

components supporting a specific service for the customer" (Office Action, pg. 2-3).

Applicants respectfully disagree.

Ferguson discloses a technique for identifying a data session flowing through entities of a multi-protocol network based on information contained within a service request provided by a user of the network (Ferguson abstract). The entities of the network comprises a System Network Architecture ("SNA") host mainframe, an end station and intermediate stations (Ferguson col. 8, lines 32-34). Ferguson uses a network management application to "provide a view of an SNA data session extending from the [physical unit] through the network environment to the host" (Ferguson col. 11 lines 34-36).

In Ferguson, a network operator can locate a user's session, which the Examiner equates to "customer records" as recited in claim 1, based upon information that the user can provide, including, for example, the SNA physical unit ("PU") or logical unit name, internet protocol address, media access control and/or service access point address (Ferguson col. 11 lines 42-48). Once the network operator locates the user session, the network operator in Ferguson can then use the network management application to "acquire the SNA-specific information" about the host and physical unit entities "available from a virtual telecommunication access method table at the host" (Ferguson col. 11 lines 21-28). Therefore, Ferguson's user session does not contain actual circuit path information, and Ferguson does not teach "providing <u>actual circuit</u> <u>path information corresponding to a customer service</u> based on the selected customer record, <u>wherein the selected customer record contains the actual circuit path</u> <u>information having heterogeneous network components associated with the selected</u>

-10-

customer record and the heterogeneous network components support a specific service for the customer, and wherein the actual circuit path information is used to generate a graphical representation of the heterogeneous network components spanning the customer and the specific service," as recited in amended claim 1.

The Examiner uses *Andersson* to allege a disclosure of storing information according to a generic information model. Even if the Examiner's characterization is correct, *Andersson* does not teach or disclose "providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the selected customer record contains the actual circuit path information having heterogeneous network components associated with the selected customer record and the heterogeneous network components support a specific service for the customer, and wherein the actual circuit path information is used to generate a graphical representation of the heterogeneous network components spanning the customer and the specific service," as recited in amended claim 1.

Amended independent claims 3 and 16, although of different scope, include recitations similar to those of amended claim 1. Thus, they are allowable over *Ferguson* in view of *Andersson*, for at least the reasons discussed above with respect to amended claim 1.

With regard to the Examiner's rejections of claims 4-8 and 17 under 35 U.S.C. 103(a) as unpatentable over *Ferguson* in view of *Andersson* and further in view of *Ahearn*, Applicants respectfully traverse these rejections as well.

Amended independent claim 17, although of different scope, include recitations similar to those of amended claim 1, which is not taught by either *Ferguson* or

-11-

Andersson, as discussed above. Applicants respectfully submit that *Ahearn* is not sufficient to overcome the deficiencies of *Ferguson* and *Andersson*. *Ahearn* discloses "a method and apparatus for viewing a configuration of a computer network" (*Ahearn* abstract). Devices in the network may be "graphically displayed according to physical connectivity and status" (*Ahearn* abstract). A network supervisor may use the system to create an "IP view of a network" that "shows all of the devices and links between a particular workstation and a particular server" (See *Ahearn* col. 6 lines 23-33; fig. 1). However, *Ahearn* does not teach or suggest "providing <u>actual circuit path information</u> <u>corresponding to a customer service</u> based on the selected customer record, <u>wherein</u> <u>the selected customer record contains the actual circuit path information having network</u> <u>components associated with the selected customer record and the network components</u> <u>support a specific service for the customer, and wherein the actual circuit path</u> <u>information is used to generate a graphical representation of a customer path spanning</u> <u>the customer and the specific service</u>," as recited in amended claim 17. Therefore, amended claim 17 is allowable not only for the reasons stated above with regard to amended claim 1, but also for its own additional features that distinguish them from *Ferguson, Andersson*, and *Ahearn*.

Moreover, dependent claims 4-8 are allowable not only for the reasons stated above with regard to their allowable base claim 3, but also for their own additional features that distinguish them from *Ferguson, Andersson*, and *Ahearn*.

Next, the Examiner rejected claims 1, 3-8, and 16-18 under 35 U.S.C. 103(a) as unpatentable over *Allen* in view of *Andersson*. With respect to claim 1, the Examiner alleged that *Allen* discloses: "receiving identification data corresponding to a customer

-12-

in a network, wherein the customer is an entity of a type selected from the group

consisting of a natural person, a company, an organization, and an enterprise;

accessing a database for one or more customer records corresponding to the customer

identification data; receiving selection information identifying a selected one of the one

or more customer records, wherein the selected customer record corresponds to the

customer; and providing actual circuit path information corresponding to a customer

service based on the selected customer record, wherein the actual circuit path

information is used to generate a graphical representation of heterogeneous network

components supporting a specific service for the customer" (Office Action, pg. 6-7).

Applicants respectfully disagree.

Allen discloses a graphical user interface ("GUI") for displaying communication

circuits information and/or customer data information related to search criteria input by a

user (Allen abstract). Allen provides the user the capability to, for example, enter "one

of several options corresponding known by the user" (Allen col. 20, lines 52-61; fig. 27)

to generate a "display of SONET [synchronous optical network] layout" (Allen col. 20

line 61-col. 21 line 3; figs. 28 and 29). However, the "display of SONET layout" in Allen

does not constitute "a graphical representation of the heterogeneous network

components spanning the customer and the specific service," as recited in amended

claim 1. Therefore, Allen does not teach "providing <u>actual circuit path information</u>

<u>corresponding to a customer service</u> based on the selected customer record, <u>wherein</u>

<u>the selected customer record contains the actual circuit path information having</u>

<u>heterogeneous network components associated with the selected customer record and</u>

<u>the heterogeneous network components support a specific service for the customer,</u>

-13-

and wherein the actual circuit path information is used to generate a graphical representation of the heterogeneous network components spanning the customer and the specific service."

The Examiner uses *Andersson* to allege a disclosure of storing information according to a generic information model. As discussed above, *Andersson* does not teach or disclose "providing actual circuit path information corresponding to a customer service based on the selected customer record, wherein the selected customer record contains the actual circuit path information having heterogeneous network components associated with the selected customer record and the heterogeneous network components support a specific service for the customer, and wherein the actual circuit path information is used to generate a graphical representation of the heterogeneous network components spanning the customer and the specific service," as recited in amended claim 1.

Because amended claims 3, 16, and 17 are independent claims with recitations similar to those of amended claim 1, they are allowable over *Allen* in view of *Andersson*, for at least the reasons discussed above with respect to amended claim 1. Furthermore, dependent claims 4-8 are allowable not only for the reasons stated above with regard to their allowable base claim 3, but also for their own additional features that distinguish them from *Allen and Andersson*.

In view of the foregoing amendments and remarks, Applicants submit that the claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request reconsideration and reexamination of the application, and the timely allowance of the pending claims.

-14-

Please grant any extensions of time required to enter this response and charge

any additional required fees to our Deposit Account No. 07-2347.

Respectfully submitted,

**VERIZON CORPORATE SERVICES
GROUP INC.**

Dated: September 13, 2005   By: _____

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-15-